

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In Re:

Chapter 7 Proceedings

Bond, Daniel Earl

Case No. 13-10177

Judge: Arthur Harris

Debtor(s)

**Motion for Authority to Sell Property Free
and Clear of Liens or Other Interests**

Now comes Virgil Brown, Trustee herein, by and through counsel, and respectfully represents to the Court as follows:

1. That he is duly appointed Trustee in the within Bankruptcy proceeding which was commenced by the filing of a Voluntary Petition for Relief under Chapter 7 of the Bankruptcy Code on or about January 11, 2013.
2. That among the assets owned by the Debtor(s), at the time of the commencement of the within Estate was an interest in the following property of the within Estate as defined in § 541 of the United States Bankruptcy Code: Five (5) shares of stock in the Geauga Title Insurance Agency, Inc., as scheduled by Debtor. .
3. That an offer to purchase the property has been received for a sum of One Thousand Dollars (\$1,000.00) which is the highest and best offer received. The purchaser is an existing shareholder of the Geauga Title Insurance Agency Inc. This offer is made from an arms-length Buyer, Dennis Ibold, Esq.
4. That it would be in the best interest of the Estate if the Trustee were authorized to sell said property clear of any and all liens and encumbrances by accepting the purchase offer.
5. Any and all liens and encumbrances shall be transferred to the fund created by the sale of said property and may be subject to costs of sale and administration pursuant to 11 U.S.C. §506(c) of the Bankruptcy Code.

WHEREFORE, your Trustee prays that he may be authorized to sell, all of the right, title and interest of the within Estate in and to the Debtor assets as set forth above, free and clear of all claims should any be recognized in the context of these proceedings and requiring that the creditors and parties served herewith set forth their interest, if any, in and to said assets of this Estate or be barred from asserting same, to enter into an purchase agreement , contract for the and for such other and further relief as is just.

/s/Virgil E. Brown, Jr. _____
Virgil E. Brown (0003675)
Attorney for the Trustee
2136 Noble Road
Cleveland, Ohio 44112
(216) 851-3304
(216) 851-2900
vbrown@epitrustee.com

NOTICE OF HEARING

A hearing is scheduled on this matter in Courtroom 1A of the U.S. Bankruptcy Court located at 201 Superior Avenue, Cleveland, Ohio 44114, on the 21st day of May, 2013, at 10:00 a.m. to consider any written objection which is filed and served not later that seven (7) days preceding the date scheduled for such hearing. If no objection is filed and served within such time, the sale may be consummated and the Motion may be granted without hearing.

/s/Virgil E. Brown, Jr. _____
Virgil Brown
Attorney for Trustee

CERTIFICATION OF SERVICE

I certify that on April 17, 2013, a true and correct copy of the Motion was served:

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

U S Trustee at Registered Address@usdoj.gov

Ellen Holland Keller, Esq. on behalf of Daniel Earl Bond at Holland@gwis.com

And by regular U.S. mail postage prepaid on:

All parties on attached Exhibit

/s/ Virgil E. Brown, Jr.
Virgil Brown Jr. (0003675)
Trustee
2136 Noble Road
Cleveland, Ohio 44112
216-851-3304
vbrown@epitrustee.com

Label Matrix for local noticing
0647-1
Case 13-10177-aih
Northern District of Ohio
Cleveland
Wed Apr 17 13:28:20 EDT 2013

Bank Of America
PO Box 982235
El Paso, TX 79998-2235

(p)CAPITAL ONE
PO BOX 30285
SALT LAKE CITY UT 84130-0285

Chase
PO Box 15298
Wilmington, DE 19850-5298

Diane A. Calt, Esq.
Joseph W. Diemertk, JR. & Assoc.
1360 SOM Center Road
Cleveland, OH 44124-2108

GC Services Limited Partnership
Dept HOVS 057
PO Box 3044
Livonia, MI 48151-3044

James R. Ford
12230 Country Oaks Trail
Chardon, OH 44024-9095

Nelson, Watson & Assoc. LLC
80 Merrimack St
Lower Level
Haverhill, MA 01830-5202

Northview Partnership
104 Water Street
Chardon, OH 44024-1202

Phoenix Life Insurance Co.
P.O. Box 8027
Boston, MA 02266-8027

Atlas Acquisitions LLC
294 Union St.
Hackensack, NJ 07601-4303

Betty Jane Bond
10484 Bell Road
Newbury, OH 44065-9124

Cardinal Point Ltd
104 Water Street
Chardon, OH 44024-1202

Citibank Universal Mastercard
PO Box 6241
Sioux Falls, SD 57117-6241

Discover Fin Svcs Llc
Po Box 15316
Wilmington, DE 19850-5316

Geauga Savings Bank
10800 Kinsman Road
Newbury, OH 44065-9744

Monarch Recovery Management, Inc.
10965 Decatur Rd
Philadelphia, PA 19154-3210

Newport Harbor Association
33 Shoreby Dr.
Bratenahl, OH 44108-1190

PNC Bank
PO Box 3180
Pittsburgh, PA 15230-3180

Professional Recovery Services Inc.
PO Box 1880
Voorhees, NJ 08043-7880

Howard M. Metzenbaum U.S. Courthouse
United States Bankruptcy Court
Howard M. Metzenbaum U.S. Courthouse
201 Superior Avenue
Cleveland, OH 44114-1235

Cach, Llc
4340 S Monaco St Unit 2
Denver, CO 80237-3408

Chase
10790 Rancho Bernardo Rd
San Diego, CA 92127-5705

Client Services, Inc
3451 Harry S Truman Blvd
Saint Charles, MO 63301-9816

(p)US BANK
PO BOX 5229
CINCINNATI OH 45201-5229

JPMorgan Chase Bank, N.A.
PO Box 260180
Baton Rouge, LA 70826-0180

National Enterprise Systems
29125 Solon Rd.
Solon, OH 44139-3442

Newport Harbour Association
33 Shoreby Dr.
Bratenahl, OH 44108-1190

Phillips & Cohen Assoc Ltd
PO Box 5790
Hauppauge, NY 11788-0164

Professional Recovery Services, Inc
PO Box 51790
Livonia, MI 48151-5790

Sears/Citibank
PO Box 6282
Sioux Falls, SD 57117-6282

Sw Crdt Sys
5910 W Plano Pkwy Suite 100
Plano, TX 75093-2202

Terrance E. Gerson
8735 Chillicothe Road
Mentor, OH 44060-7876

USAA Savings Bank
PO Box 47504
San Antonio, TX 78265-7504

United Collection Bureau, Inc.
5620 Southwyck Blvd
Ste 206
Toledo, OH 43614-1501

United Recovery Systems
P.O. Box 722929
Houston, TX 77272-2929

United Recovery System
5800 North Course Dr.
Houston, TX 77072-1613

Weltman, Weinberg & Reis Co., LPA
323 W. Lakeside Ave.
Suite 200
Cleveland, OH 44113-1099

Wm. R. Gray Associates, Inc.
9472 Hamilton Dr.
Mentor, OH 44060-8708

Daniel Earl Bond
10484 Bell Road
Newbury, OH 44065-9124

Ellen Holland Keller
55 Public Sq
#1510
Cleveland, OH 44113-1998

Virgil E Brown Jr
2136 Noble Road
Cleveland, OH 44112-1736

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Cap One
PO Box 85520
Richmond, VA 23285

Elan Financial Service
PO Box 790084
Saint Louis, MO 63179

(d)U S Bank
101 5th St E Ste A
Saint Paul, MN 55101

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Atlas Acquisitions LLC
294 Union St.
Hackensack, NJ 07601-4303

(d)Client Services, Inc.
3451 Harry S Truman Blvd
Saint Charles, MO 63301-9816

End of Label Matrix	
Mailable recipients	41
Bypassed recipients	2
Total	43